



DEPARTMENT OF THE ARMY
CALIFORNIA ARMY NATIONAL GUARD
HEADQUARTERS, CAMP ROBERTS
CAMP ROBERTS, CALIFORNIA 93451-5000

CACR-CDR (200)

6 October 2006

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Environmental Management at Camp Roberts

1. Purpose. This memorandum reconfirms additional duties regarding environmental management at Camp Roberts. The memorandum dated 20 January 2006, subject as above is rescinded.

2. Environmental Quality Compliance Committee. LTC Kevin Brown has the additional duty as Environmental Compliance Officer (ECO) and chairman of the Environmental Quality Compliance Committee (EQCC) for Camp Roberts. As ECO, he is responsible for implementing the procedures established by CA ARNG Hazardous Material & Waste Management Plan (HMWMP). The ECO will select committee members from the directorates and hold monthly meetings to manage regulatory compliance of all hazardous waste-generating activities within the organization. John Morrow (State Environmental Compliance Officer) will also be a member of the committee. Specific responsibilities of the ECO and EQCC:

- a. Create and implement an action plan to correct deficiencies identified by Internal Compliance Assessment System (ICAS) Inspections.
- b. Function as liaison between the installation and the State Hazardous Waste Manager (HWM) on environmental issues.
- c. Provide HMWMP briefings to unit personnel at least quarterly.
- d. Ensure compliance with local environmental regulations. At each EQCC meeting the Environmental Compliance Officer and local State Environmental Compliance Officer will brief the committee on the status of required regulatory reports.
- e. Ensure compliance with environmental contracts.
- f. Promote recycling and pollution prevention in hazardous waste and hazardous materials management. Implements Best Management Practices (BMP). BMPs are any practice that eliminates, reduces, recycles, or diverts hazardous materials from becoming hazardous waste or prevents the accidental release (spill) of hazardous materials into the environment.
- g. Ensure management of all hazardous chemicals procured with credit cards.

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h. Procure, maintain, and update Material Safety Data Sheets (MSDS) for all hazardous chemicals stored or used at Camp Roberts.

i. Notify the HWM of changes in chemicals used, chemicals stored, storage locations, process changes, and waste streams.

j. Maintain environmental and waste management records that include inspection results, inventory forms, and training records.

k. Ensure proper handling and storage requirements for Hazardous Materials (HM)/POL, and all wastes are met. This includes ensuring all persons comply with HW procedures when managing waste containers.

l. Ensure that turn-in and shipping documents are in order and those containers meet applicable standards.

m. Ensure that all personnel who handle hazardous waste successfully complete the required training program.

n. Schedule physical inspections/checklists/inventories of:

- Aboveground/Underground Storage Tanks.
- Motor Pool area for evidence of leaks and spills (drip pans).
- Hazardous Material/Waste storage areas (janitor's area, any materials storage areas).
- Secondary containment areas/drive-on system.

o. **Ground Disturbance Report.** The Environmental Compliance Officer and local State Environmental Compliance Officer will brief the committee on ground disturbing activities since the last meeting and their impact on vegetation, threatened and endangered species, and cultural resources. The EQCC will discuss and collectively determine which of these activities has a reasonable long-term negative impact, methods to preclude or mitigate, and the general trend. The Environmental Compliance Officer will prepare a summary report and forward to the Post Commander and the senior State Environmental Compliance Officer at JFHQ-CA.

3. Installation On-Scene Coordinator. Reference the Spill Prevention, Control, and Countermeasures Plan for Camp Roberts. Chief Winfred Breland, Camp Roberts Fire Chief is assigned the additional duty as Installation On-Scene Coordinator. General duties:

a. Evaluates spill reports and directs and coordinates control and clean up efforts at the scene of a spill;

b. Establishes and maintains a Response Operations Center (ROC) to act as the central message receiving and distributing center during a spill;

c. Notifies local law enforcement and medical authorities if needed;

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- d. Notifies and provides necessary information to the appropriate federal, state, and local authorities;
- e. Coordinates with CA ARNG Emergency Coordinator for necessary response equipment, personnel, and supplies;
- f. Requests assistance from other response agencies as needed;
- g. If the spill is reportable: notifies appropriate agencies, maintains incident log, and keeps local health officials informed of the situation.

4. Installation Response Team. Reference the Spill Prevention, Control, and Countermeasures Plan for Camp Roberts.

- a. Personnel and Equipment: Approximately 2 – 4 full-time employees provide 24-hour emergency service from the Camp Roberts' Fire Department. Equipment includes two Structure type Fire Engines with 6% aqueous fire fighting foam (AFFF) capabilities and a limited amount of absorbent material. The DPW (CW2 Dougal and Johnie Dilbeck) and the Camp Roberts Fire Department is the IRT for Camp Roberts.
- b. Additional Help Available: If an incident requires spill diversion, Camp Roberts will request the services of the Public Works Center's heavy equipment.
- c. Training: The Camp Roberts' Fire Department conducts an annual spill exercise, which include classroom work and staged spill scenarios.



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